

**IN THE UNITED STATES DISTRICT
COURT EASTERN DISTRICT OF
MISSOURI EASTERN DIVISION**

ALLAEDHIN QANDAH,)	
)	
Plaintiff,)	
)	
vs.)	Case No: 4:20-cv-00053-JCH
)	
ST. CHARLES COUNTY,)	
MISSOURI, et. al,)	
)	
Defendants.)	

**MOTION FOR EXPENSES PURSUANT TO THIS COURT’S ORDER GRANTING
PLAINTIFF’S MOTION FOR SANCTIONS**

Plaintiff Allaedhin Qandah moves for an award of expenses pursuant to this Court’s September 8, 2020 order granting Plaintiff’s Motion for Sanctions.

1. Plaintiff filed a Motion for Sanctions on July 10, 2020 (ECF No. 30), which this Court granted in its entirety on September 8, 2020. ECF No. 47.

2. Specifically, this Court ordered, “Plaintiff is granted until Monday, September 28, 2020, within which to file a motion seeking an award of his expenses that would not have been sustained had St. Charles County complied with this Court’s January 13, 2020 Order without additional effort from Plaintiff.” *Id.*

3. Plaintiff seeks reimbursement by Defendants for costs incurred of \$805.86 and \$11,975.00 in attorneys’ fees for a total award of \$12,780.86. *See* Exhibit 1, Affidavit of Maureen Hanlon.

4. These expenses are reasonable and in keeping with expenses authorized by Rule 37(b)(2)(C), as outlined in the attached Memorandum of Law.

WHEREFORE, Plaintiff respectfully requests this Court grant his Motion for Expenses

and order Defendants to reimburse Plaintiff's expenses in the amount of \$12,780.86, and for such other relief as this Court deems proper under the circumstances.

Date: September 28, 2020

Respectfully submitted,

ArchCity Defenders, Inc.

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